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9 LISA LIBERI, LISA M. OSTELLA, GO EXCELL GLOBAL,
PHILIP J. BERG, ESQ. and THE LAW OFFICES OF PHILIP J. BERG
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12 UNITED STATES DISTRICT COURT
13 CENTRAL DISTRICT OF CALIFORNIA
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15 LISA LIBERI, etc., et. al.

16 Plaintiffs

17 v.

18 ORLY TAITZ, etc., et. al.

19 Defendants.
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CASE NO. CV 11-CV -00485 AG
(AJWx)

**PLAINTIFFS OBJECTIONS TO
DEFENDANT ORLY TAITZ'S
REQUEST FOR JUDICIAL
NOTICE**

Date: June 17, 2013
Time: 10:00 a.m.
Courtroom: 10D

Date Action Filed: May 4, 2009
Trial Date: None set

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24 Plaintiffs Lisa Liberi, Lisa M. Ostella, Go Excell Global, Philip J. Berg,
25 Esq. and the Law Offices of Philip J. Berg hereby object to the following
26 documents of which Defendant Orly Taitz ["Taitz"] is requesting this Court to
27 take Judicial Notice in attempts to support her Anti-SLAPP Motion to Dismiss the
28 Plaintiffs' First Amended Complaint ["FAC"].

1 Judicial Notice may be taken only of “matters of common knowledge” and
2 “readily verifiable facts”. Fed. R. Evid. 201.

3 Plaintiffs object to Items Nos. 2, 3, and 4 of Taitz’s Request for Judicial
4 Notice on the grounds that the said documents are not relevant (Fed. R. Evid. 402)
5 and constitute inadmissible hearsay [Fed. R. Evid. 802]. These documents,
6 consisting of unauthenticated computer print-outs, purport to relate to a criminal
7 conviction of Lisa Liberi. These documents are not relevant to the within action
8 and this Court has stated such several times.

9 Plaintiffs object to Items Nos. 7,8, and 9 Taitz's Request for Judicial Notice
10 on the grounds that these documents are not relevant to the issues before the Court
11 on Taitz’s Anti-SLAPP Motion. [Fed. R. Evid. 402.] These documents relate to
12 orders of this Court dismissing other defendants or other claims, based on different
13 theories or on facts or legal theories specific to those other defendants, and have
14 no relevancy to the issues raised on Taitz’s Anti-SLAPP Motion.

15 Further, Plaintiffs object to Items Nos. 1, 2, 3, 4, 5, 7, 8, and 9 of Taitz’s
16 Request for Judicial Notice for the additional reason that these documents go
17 beyond the FAC, do not contain facts which are indisputable, and are not proper
18 for consideration of Taitz’s Anti-SLAPP Motion.
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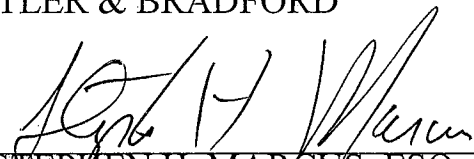
1 For the reasons outlined above, Plaintiffs respectfully request that this Court
2 decline and deny Taitz's Request for Judicial Notice Nos. 1 through 5 and 7
3 through 9.

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5 Dated: May 31, 2013

LAW OFFICES OF PHILIP J. BERG

GITTLER & BRADFORD

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8 By:


STEPHEN H. MARCUS, ESQ.

9 Attorneys for Plaintiffs

10 LISA LIBERI, LISA M. OSTELLA, GO
11 EXCELL GLOBAL, PHILIP J. BERG,
12 ESQ. and THE LAW OFFICES OF PHILIP
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